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STATE OF INDIANA INDIANA UTILITY REGULATORY COMMISSION

INDIANA UTILITY
REGULATORY COMMISSION

PETITION OF INDIANA-AMERICAN)	- 11 OUNIVI19910F
WATER COMPANY, INC. FOR)	
AUTHORITY TO INCREASE ITS RATES)	
AND CHARGES FOR WATER AND)	CAUSE NO. 43187
SEWER SERVICE, FOR APPROVAL OF)	
NEW SCHEDULES OF RATES AND)	
CHARGES APPLICABLE THERETO,)	
AND FOR APPROVAL OF CERTAIN)	
TARIFF CHANGES TO IMPLEMENT A)	
TRACKING MECHANISM FOR)	
PURCHASED POWER COSTS		

PETITIONER'S SUBMISSION OF CORRECTIONS TO JOSEPH VAN DEN BERG'S PREFILED DIRECT TESTIMONY

Pursuant to the Prehearing Conference Order in this matter, Petitioner, Indiana-American Water Company, Inc. ("Petitioner") by counsel, submits herewith corrections to the prefiled testimony of Joseph Van den Berg. The corrections concern page 12 of <u>Petitioner's Exhibit AJV</u> and were identified in response to an OUCC discovery request. A redline showing the revisions to page 12 is attached hereto as Attachment A. Petitioner will offer Mr. Van den Berg's testimony into evidence with the revised page 12 in the form shown on Attachment B.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served by First Class United States Mail, postage prepaid, upon the following, this 14th day of March, 2007.

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Similarly, an article appearing in Public Utilities Reports, Inc. estimated the cost of CIS replacement at \$50 per customer. This estimate projects a price of installing a CIS system for Indiana American at \$13.6 million, based on Indiana American's 2003 customer base of 272,000. AWW's total expense considering a 2003 customer base of 2.9 million would have been \$145 million, \$13.6 million of which would have been allocated back to Indiana American.

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A.

Based on the industry benchmarks, I estimate that the current costs for a CIS implementation for a company the size of Indiana American and with similar functionality, would cost in excess of \$10 million. These estimates are validated by my client experiences, proprietary knowledge of non-clients costs, and internal estimates of proposal-quality costs. Indiana American implemented its Orcom E-CIS for much less.

Q. What about the Commission's concern that E-CIS costs increased simply because Indiana American went live with E-CIS as one of twenty two companies rather than only one of eight?

This concern results from the second basic misunderstanding of the original Orcom agreement. The original Orcom agreement was intended

Deleted: In 2005, Meta Group conducted a study which estimated the average cost to install a CIS at \$44 per customer. Costs varied by utility size; small utilities averaged \$68 per customer, medium utilities \$54 per customer, and large utilities \$34.88 per customer

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Van den Berg (Revised) -- 12

³ Dr. Zarko Sumic, North American CIS Market in Transformation Public Utilities Reports, Inc. May, 2004

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³ Dr. Zarko Sumic. North American <u>CIS Market in Transformation</u> Public Utilities Reports, Inc., May, 2004